IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

POOR PEOPLE'S ECONOMIC HUMAN RIGHTS CAMPAIGN,

No. 16-cv-3281

Plaintiff,

v.

CITY OF PHILADELPHIA,

Defendant.

PLAINTIFF'S MOTION FOR **PRELIMINARY INJUNCTION**

Plaintiff hereby moves, pursuant to Fed. R. Civ. P. 65, for entry of a preliminary injunction enjoining Defendant City of Philadelphia from enforcing its ban on political street marches on Center City streets between 3 PM and 6 PM. In support thereof, Plaintiff hereby incorporates the accompanying Memorandum of Law and exhibits.

WHEREFORE, Plaintiff respectfully requests that this Court schedule a preliminary injunction hearing after expedited discovery and thereafter enter the accompanying proposed order granting a preliminary injunction.

Dated: June 24, 2016. Respectfully submitted,

/s/ Mary Catherine Roper

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CERTIFICATE OF SERVICE

I hereby certify that on this date, the foregoing PLAINTIFF'S MOTION FOR

PRELIMINARY INJUNCTION, together with the accompanying MEMORANDUM OF LAW

and PROPOSED ORDER, were filed electronically and served on all counsel of record via the

ECF system of the United States District Court for the Eastern District of Pennsylvania.

Dated: June 24, 2016

/s/ Mary Catherine Roper

Mary Catherine Roper

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